## Exhibit 1

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE : No. 2:12-md-02323-AB PLAYERS' CONCUSSION INJURY : MDL No. 2323 :

THIS DOCUMENT RELATES TO:

:

Hon. Anita B. Brody

ALL ACTIONS

DECLARATION OF ORRAN L. BROWN, SR.

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

- My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC, located at 250 Rocketts Way, Richmond, Virginia 23231. BrownGreer PLC is the Claims Administrator under the Class Action Settlement Agreement in this action.
- 2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.
- 3. I submit this Declaration to describe an Opt Out revocation request that we received recently.
- 4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to post a list of Opt Outs as of that date. Accordingly, we posted on the official Settlement website a list of the Opt Outs that were timely and included all the elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (175 names at the time) and a list of the Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements (33 names at the time).
- 5. Section 14.2(c) of the Settlement Agreement provides that a Class Member who had Opted Out but wished to revoke that Opt Out could submit a written request to do

So "[p]rior to the Final Approval Date." At various times after the April 22, 2015 Final Approval Date, 18 people who had Opted Out submitted requests to revoke their Opt Outs. The Parties to the Settlement Agreement agreed to accept those revocation requests, subject to Court approval, and reported the revocation requests to the Court. By Orders of July 15, 2015 (Document 6642), December 22, 2015 (Document 6713), January 26, 2016 (Document 6739), September 15, 2016 (Document 6907), October 25, 2016 (Document 6924), November 8, 2016 (Document 6937), December 21, 2016 (Document 7033), January 18, 2017 (Document 7084), and January 20, 2017 (Document 7097), the Court approved all the revocations. As a result, we no longer counted those people as Opt Outs and posted on the Settlement website a revised list of Timely Opt Out Requests Containing All Information Required by Section 14.2(a) or Otherwise Approved by the Court (the "Timely Opt Out List") to reflect the results of the Orders. That Timely Opt Out List now contains 162 names, including the five people whose Opt Outs the Court directed be added to that list in its Order of September 8, 2016 (Document 6902).

- 6. On January 31, 2017, we received a letter from Mr. Mark Washington asking to revoke his Opt Out. Mr. Washington is on the Timely Opt Out List. I have attached a copy of his letter, with his address redacted, to this Declaration. The Parties to the Settlement Agreement have agreed to accept this revocation request, subject to Court approval. If the Court grants its approval, we no longer will count Mr. Washington as an Opt Out and, upon the Court's direction, we will post a revised Timely Opt Out List on the Settlement website.
- I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 31<sup>st</sup> day of January, 2017.

Orran L. Brown, Sr.

## MARK WASHINGTON

January 18, 2017

VIA FACSIMILE: 212-757-3990

Paul, Weiss, Rifkind, Wharton & Garrison, LLP Attn: Brad S. Karp 1285 Avenue of the Americas New York, NY 10019-6064

VIA FACSIMILE: 212-584-0799

Seeger Weiss LLP Attn: Christopher A. Seeger 77 Water Street New York, NY 10005

VIA FACSIMILE: 212-521-7299

Orran L. Brown, Sr. Claims Administrator Brown Greer PLC 250 Rockets Way Richmond, VA 23231

Re: In re National Football League Players' Concussion Injury Litigation;

Case No. 12md2323; MDL No. 2323;

Revocation of Opt-Out of Plaintiff Mark Washington

Dear Sirs:

Pursuant to Section 14.2(e) of the Class Action Settlement Agreement (as amended), in the above-referenced litigation, I, MARK WASHINGTON, hereby state that I wish to revoke my Opt-Out request to be excluded from the Settlement Class.

It is my wish that I be restored to a member of the Settlement Class.

Thank you.

Mark Washington